

Huan-Ting Wu (SBN: 334851)



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Attorneys for Witnesses
C.F. and Z.W.

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SANTA CLARA

THE PEOPLE OF THE STATE OF
CALIFORNIA,

Plaintiff,

v.

LIREN CHEN

Defendant.

Case No. C2400832

**APPLICATION FOR ORDER LIMITING
THE PUBLICITY AND PROTECTING
WITNESSES C.F. AND Z.W. DURING
THE PRELIMINARY EXAMINATION**

Date: June 23, 2025

Time: 1:30 9.m.

Dept.: 39

TO: THE CLERK OF THE ABOVE-ENTITLED COURT, THE DISTRICT
ATTORNEY FOR THE COUNTY OF SANTA CLARA, AND THE COUNSEL
FOR DEFENDANT:

PLEASE TAKE NOTICE that witnesses C.F. and Z.W., by and through their attorney
Huan-Ting Wu, hereby apply to the Court for an order limiting the publicity and protecting
witnesses C.F. and Z.W. during the preliminary examination, which is currently scheduled for
June 23, 2025.

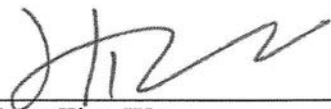
This application is made on the grounds that Santa Clara County Court Criminal Rules
2(B)(2)(d)(v) authorizes individual judges the discretion to allow remote observation by non-
participants and the authority to manage remote observation, and that witnesses C.F. and Z.W.

1 have security concerns about having their names, voices, and images disseminated to the public,
2 and especially to the public watching this proceeding remotely, and by this application bring their
3 concerns to the Court's attention according to Santa Clara County Court Criminal Rules
4 2(B)(2)(d)(i)

5 Respectfully submitted,

6 Dated: June 20, 2025

NOLAN BARTON OLMOS & LUCIANO, LLP

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9 _____
Huan-Ting Wu
Attorney for Witnesses C.F and Z.W.

1 Huan-Ting Wu (SBN: 334851)



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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **IN AND FOR THE COUNTY OF SANTA CLARA**

11 THE PEOPLE OF THE STATE OF
12 CALIFORNIA,

13 Plaintiff,

14 v.

15 LIREN CHEN

16 Defendant.

Case No. C2400832

**DECLARATION OF HUAN-TING WU IN
SUPPORT OF APPLICATION FOR
ORDER LIMITING THE PUBLICITY
AND PROTECTING WITNESSES C.F.
AND Z.W. DURING THE PRELIMINARY
EXAMINATION**

17 Date: June 23, 2025
18 Time: 1:30 p.m.
19 Dept.: 39

20 I, Huan-Ting Wu, hereby declare:

- 21 1. I am an attorney at law licensed to practice in the state of California. I represent witnesses
22 C.F. and Z.W. in the above-entitled case.
23 2. I am informed and believe that the above-titled case has received extensive media and
24 press coverage in the Chinese communities in the U.S. as well as in China. For example,
25 the photos previously taken by the press and media on defendant Liren Chen, defense
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1 counsel Wesley Schroeder, and DDA Michael Gadeberg have been posted on the

2 Mandarin internet news and media sites and read and circulated by millions of readers.¹

3 3. I am informed and believe that the above-titled case has also been closely followed by at
4 least dozens of Chinese self-media and content generators, who make videos about the case
5 based on unverified information, speculative opinions, and anecdotes, and circulate their
6 comments and videos in the Chinese communities through social media and content
7 platforms such as YouTube,² which have put individuals involved in the above titled case
8 under serious false light.

9 4. I am informed and believe that witnesses C.F. and Z.W. are the witnesses who last saw and
10 contacted the victim and defendant, and who first arrived at the scene and called the police
11 on the date the incident occurred.

12 5. I am informed and believe that witnesses C.F. and Z.W. have been subpoenaed to testify at
13 the preliminary examination by DDA Michael Gadeberg.

14 6. I am informed and believe that since the charged incident occurred, C.F. and Z.W. have
15 received numerous unwanted contacts from the media and press, which in turn has caused
16 them undue stress and concerns regarding their safety and has required C.F. and Z.W. to
17 seek help from mental health professionals.

18 7. I am informed and believe that the underlying facts of this incident have triggered a
19 traumatic response that has caused witnesses C.F. and Z.W. to seek help from mental
20 health professionals.

21 8. I am informed and believe that C.F. and Z.W. have serious concerns that once they testify
22 at the preliminary examination, their names and identities will be publicized to the world-
23 wide Chinese communities, which is highly likely to cause additional unwanted contacts

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26 ¹ See, e.g., <https://sf.epochtimes.com/2024/01/27/22007.html>,
<https://www.worldjournal.com/wj/story/121519/7911948>.

27 ² See, e.g., <https://www.youtube.com/watch?v=9dKB8dhjZ40>, <https://www.youtube.com/watch?v=7PIZlg1asoc>,
28 <https://www.youtube.com/watch?v=HFm0fGVddRk>.

1 from the press, the media, and strangers who read about them, and thereby endangers their
2 safety and causes undue burden on their mental health.

3 9. I am informed and believe that DDA Michael Gadeberg is going to request the Court to
4 permit remote observation of the hearing.

5 10. I am informed and believe that C.F. and Z.W. have serious concerns that if the Court
6 allows remote observation of the hearing, their voices, images, and testimony will be
7 recorded, re-broadcasted, or even reproduced into press and media sites on the internet,
8 social media, and content platforms, putting them under unnecessary and undue publicity
9 and placing their safety at risk. Because many of the media sites and social media
10 platforms are based outside California and outside the United States, I fear that this court
11 will have little ability to enforce restrictions or order remedies regarding the recording and
12 dissemination of the names, images, and voices of witnesses C.F. and Z. W.

13 11. For the foregoing reasons, it is respectfully requested that the Court limit the publicity of
14 witnesses C.F. and Z.W. to the scope as suggested in the proposed order during the
15 preliminary examination of the above-titled case that is currently scheduled on June 23,
16 2025, so that witnesses C.F. and Z.W. can have an opportunity to testify in an environment
17 that is free of threats to their privacy, safety, and mental health, as well as be free from any
18 undue exterior undue influence.

19
20 I declare under penalty of perjury that the foregoing is true and correct, except for those
21 matters stated on information and belief, and as to those matters I am informed and believe them
22 to be true. This declaration was executed in Palo Alto, California, on the 20th day of June, 2025.

23 NOLAN BARTON OLMOS & LUCIANO, LLP

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26 Huan-Ting Wu
27 Attorney for Witnesses C.F and Z.W.
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1 Huan-Ting Wu (SBN: 334851)



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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **IN AND FOR THE COUNTY OF SANTA CLARA**

11 THE PEOPLE OF THE STATE OF
12 CALIFORNIA,

13 Plaintiff,

14 v.

15 LIREN CHEN

16 Defendant.

Case No. C2400832

**[PROPOSED] ORDER LIMITING
PUBLICITY AND PROTECTING
WITNESSES C.F. AND Z.W. DURING
THE PRELIMINARY EXAMINATION**

Date: June 23, 2025

Time: 1:30 p.m.

Dept.: 39

18
19 The Court, having reviewed witnesses C.F. and Z.W.'s application limiting the publicity
20 and protecting witnesses C.F. and Z.W. and their counsel's declaration, hereby makes the
21 following orders regarding their testifying in the preliminary examination:
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23 IT IS HEREBY ORDERED THAT:
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1. If C.F. and Z.W. are called to testify, the hearing shall be closed to the public to allow them to first identify themselves on the record. After they identify themselves on the record, the hearing shall resume open to the public during their testifying.
2. No photos, audio, or video recording of C.F. and Z.W. are permitted at the courthouse before, during, and after their testimony.
3. Observants of the hearing, either remote or personally present, shall not contact, follow, or attempt to contact or follow C.F. and Z.W. before, during, and after the hearing.
4. The hearing shall not be photographed, recorded (audio or video), re-broadcasted, or reproduced by any person who is personally present or who is appearing, participating, or observing remotely.
5. All the remote observants shall be required to identify themselves and acquire the permission of the Court in advance to remotely attend the proceeding.
6. All parties permitted to remotely monitor the proceeding shall be required to acknowledge and agree to comply with the court orders prohibiting the photographing and audio or video recording, re-broadcasting or reproduction of any part of the proceeding. To the extent it is necessary, the court shall use a certified Mandarin-speaking interpreter to ensure that all parties monitoring the hearing remotely have understood and acknowledged these orders.
7. All parties permitted to remotely monitor the proceeding shall be required to turn on their cameras at all times during the hearing.
8. All orders limiting publicity and protecting witnesses C.F. and Z.W. and otherwise governing to recording and dissemination of recordings of this preliminary examination shall be interpreted and read to the public by a certified Mandarin-speaking interpreter.

Dated:

Judge of Superior Court

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PROOF OF SERVICE

STATE OF CALIFORNIA)
COUNTY OF SANTA CLARA) *People v Chen*
Case No. C2400832

I am a citizen of the United States and am employed in the County aforesaid; I am over the age of eighteen years and not a party to this action; my business address is: 600 University Avenue, Palo Alto, California.

On June 23, 2025, I served the within **APPLICATION FOR ORDER LIMITING THE PUBLICITY AND PROTECTING WITNESSES C.F. AND Z.W. DURING THE PRELIMINARY EXAMINATION; DECLARATION OF HUAN-TING WU IN SUPPORT OF APPLICATION; [PROPOSED] ORDER**, by sending it via electronic mail as indicated below:

DDA M. Gadeberg: mgadeberg@dao.sccgov.org
Wes Schroeder: atty.ws@gmail.com

I declare under the penalty of perjury that the foregoing is true and correct. Executed on this the 23rd day of June, 2025, at Palo Alto, California.



Jill Gardella